

September 1, 2004

Mr. Ron Leach
Toxics & Waste Management Div.
U.S. EPA Region 9 (H-4-4)
75 Hawthorne Avenue
San Francisco, CA 94105

CERTIFIED LETTER
RETURN RECEIPT REQUESTED

MONTHLY SUMMARY REPORT REGARDING THE MONTH OF AUGUST 2004

CP Chemicals, Inc. (formerly Southern California Chemical)
Santa Fe Springs, CA (CAD008488025)
(USEPA Docket No. RCRA-09-89-0001)

Dear Mr. Leach:

This monthly summary report with attached tables constitutes a submittal by CP Chemicals, Inc. ("Respondent") to the United States Environmental Protection Agency ("EPA") in compliance with the terms of the Administrative Order of Consent ("Consent Order") effective December 8, 1988.

This summary addresses Section VI.3.b of the Consent Order. The report describes:

- A) The actions taken by or on behalf of Respondent during the previous month;
- B) Actions expected to be undertaken during the current month; and C) All results of sample analyses, tests and other data generated or received by Respondent.

Table I lists the actions taken during the current month. Table II lists actions planned for the upcoming month. Please call me at (562) 698-8036 if you have any questions.

Sincerely,

Martin Voss EHS Manager

Attachments

cc: see the following page

cc: Sharon Wallin Camp Dresser & McKee, Inc. 18581 Teller Avenue, Suite 200

Irvine, CA 92612

Kathy San Miguel Department of Toxic Substances Control 5796 Corporate Avenue Cypress, CA 90630

Florence Gharibian, Branch Chief Department of Toxic Substances Control Statewide Compliance Division, Region 3 1011 N. Grandview Avenue Glendale, CA 91201

Steve Cohen CP Chemicals, Inc. One Parker Plaza Fort Lee, NJ 07024

Table I

The following is a summary of actions taken during the month of August 2004 by Respondent in compliance with the Consent Order.

- 1. The Third Quarter 2004 Groundwater Monitoring Report has commenced being prepared.
- Phibro-Tech and DTSC met on June 25, 2004 to resolve pending issues concerning the Site Conceptual Model. The meeting went well and both parties are looking forward to the completion of this document so decisions can be made from it. *
- Based upon the recommendations from the aforementioned June 25, 2004 meeting, Phibro-Tech and CDM issued a third revised draft Site Conceptual Model to DTSC on July 16, 2004.
- A conference call between DTSC and Phibro-Tech took place on August 31, 2004, to discuss DTSC's comments on the third revision of the Site Conceptual Model.
- 5. Phibro-Tech submitted the following work plans and reports to DTSC in 1998 and 2001:
 - a. "Phase II Soil Vapor Survey and SVE Pilot Test Work Plan", dated October 17, 2001
 - b. "Bioventing Treatability Study Work Plan", dated February 16, 1998.
 - c. "Final Soil Vapor Survey Work Plan", dated February 16, 1998
 - d. "Final Phase I corrective Action Soil Vapor Survey Report", dated November 16, 2001

Phibro-Tech received comments regarding these work plans and reports in a letter from DTSC dated March 12, 2004. *

6. Phibro-Tech, with the help of CDM, submitted a Generic Soil Vapor Survey work plan to DTSC on June 23, 2004. *

*Note: These items did not take place in July but as noted. They are being kept here to retain the latest developments for site corrective action.

Table II

Respondent will take the following actions during the month of September 2004 in compliance with the Consent Order:

- 1. The Third Quarter 2004 Groundwater Monitoring Report will continue being prepared.
- Changes to the third revision of the Site Conceptual Model will be submitted to DTSC by September 15, 2004.